

1 THE HONORABLE MARSHA J. PECHMAN  
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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

9 BOARD OF TRUSTEES OF THE  
EMPLOYEE PAINTERS' TRUST, *et al.*,

10 Plaintiffs,

11 vs.

12 CHAMPION PAINTING SPECIALTY  
SERVICES CORP, a Florida corporation;  
CARLOS HERNANDEZ, an individual;  
BERKSHIRE HATHAWAY SPECIALTY  
INSURANCE COMPANY, a Nebraska  
corporation; OLD REPUBLIC SURETY  
COMPANY, a Wisconsin corporation;  
LIBERTY MUTUAL INSURANCE  
COMPANY, a Massachusetts corporation;  
WASHINGTON STATE DEPARTMENT OF  
TRANSPORTATION, a political subdivision of  
the State of Washington; ROGNLIN'S, INC., a  
Washington corporation; DOES & ROES I-X,

19 Defendants.

20 CASE NO.: 2:21-cv-00858-MJP

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**STIPULATION AND ORDER FOR  
DISMISSAL, WITH PREJUDICE**

Plaintiffs Board of Trustees of the Employee Painters' Trust, *et al.* ("Plaintiffs"), and  
Defendants Champion Painting Specialty Services Corp, Carlos Hernandez, Old Republic  
Surety Company, Berkshire Hathaway Specialty Insurance Company, Liberty Mutual Insurance  
Company, Washington State Department of Transportation, and Rognlin's, Inc. ("Defendants")

**STIPULATION AND ORDER FOR  
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Case No. 2:21-cv-00858-MJP

1 (Plaintiffs and Defendants are collectively the “Parties”), each acting by and through their  
2 undersigned counsel, hereby stipulate and agree as follows:

- 3       1) That Plaintiffs and Defendants Champion Painting Specialty Services Corp. and  
4            Carlos Hernandez have entered into a written Settlement Agreement effective  
5            February 25, 2022 (“Settlement Agreement”), the performance of which will result  
6            in the release of all claims asserted in this action;
- 7       2) Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), that all claims asserted in this action shall  
8            be and are hereby dismissed with prejudice;
- 9       3) That the Court shall retain jurisdiction to enforce the Settlement Agreement; and

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**STIPULATION AND ORDER FOR  
DISMISSAL, WITH PREJUDICE**

Case No. 2:21-cv-00858-MJP

1           4) That each party shall bear its own attorney's fees and costs.

2           DATED this 17th day of March 2022.

3 CHRISTENSEN JAMES & MARTIN

4 By: /s/ Wesley J. Smith

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*Counsel for Rognlin's, Inc. and Liberty  
Mutual Insurance Company*

IT IS SO ORDERED.

Dated this 18th day of March, 2022.



23 Honorable Marsha J. Pechman  
24 United States Senior District Judge

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Page 4

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